

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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DINOSAUR FINANCIAL GROUP LLC,	:
HILDENE CAPITAL MANAGEMENT, LLC and	:
SWISS LIFE INVESTMENT MANAGEMENT	:
HOLDING AG, on behalf of themselves and all	:
others similarly situated,	:
	:
Plaintiffs,	:
	:
-v-	:
	:
S&P GLOBAL, INC., AMERICAN BANKERS	:
ASSOCIATION, and FACTSET RESEARCH	:
SYSTEMS INC.,	:
	:
Defendants.	:
	:
-----X	

Case No. 1:22-CV-1860 (KPF)

Rule 502(d) Stipulation and Order

WHEREAS, the Parties desire to produce documents, including electronically stored information (“ESI”), which are or may be subject to claims of privilege or protection, including the attorney-client privilege, work-product doctrine, or other privileges or doctrines (“Protected Information”), solely for the purpose of resolving disputes as to any Party’s claim that documents constitute or include Protected Information (“Privilege Dispute”).

NOW, THEREFORE, it is stipulated and agreed subject to Court approval:

- (1) No Waiver By Disclosure: Pursuant to Rule 502(d) of the Federal Rules of Evidence, if a Party (the “Disclosing Party”), for the purpose of resolving a Privilege Dispute, discloses documents in connection with this litigation that the Disclosing Party claims is or includes Protected Information, the disclosure of that Protected Information will not constitute or be deemed a waiver or forfeiture in this case or in any other federal or state action of any claim of privilege or work-product protection that the Disclosing Party would otherwise be entitled to assert with respect to the Protected Information and/or its subject matter. For the provisions of this Order to apply to a disclosure, the Disclosing Party must: (1) inform the Parties that it is disclosing the document(s) pursuant to the Rule 502(d) Stipulation and Order, and (2) identify the relevant documents by Bates Number.

- (2) Nothing herein is intended to require a Party to disclose information pursuant to Rule 502(d) that it contends is subject to privilege or other protection from production for purposes of resolving a discovery dispute.
- (3) Nothing contained herein is intended to or shall serve to limit a Party's right to conduct a review of documents, ESI, or other information (including metadata) for relevance, responsiveness, or segregation of Protected Information before production. Furthermore, nothing contained herein is intended to affect or change any other order entered in this litigation, including the Stipulated Protective Order (ECF No. 125) and ESI Protocol (ECF No. 123), or the Parties' obligations under Federal Rule of Evidence 502(b) regarding inadvertent disclosure.

SO ORDERED.

Dated: January 2, 2025  
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla".

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Hon. Katherine Polk Failla  
United States District Court Judge

By: /s/ Ronald J. Aranoff

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